

IOWA DEPARTMENT OF PUBLIC HEALTH
Bureau of Radiological Health
Lucas State Office Building, Des Moines, IA 50319-0075

October, 1999

IDPH INFORMATION NOTICE 99-X07: The role of the diagnostic radiographer, auxiliary personnel, and the licensed physician in performing diagnostic radiography.

ADDRESSEES: Anyone operating radiation-emitting equipment in Iowa

PURPOSE:

The Iowa Department of Public Health (IDPH) is issuing this information notice to clarify the role of the diagnostic radiographer, auxiliary personnel, and the licensed physician in performing diagnostic radiography in Iowa. It is expected that recipients will review the information for applicability to their individual situations and consider actions as appropriate. No written response to this notice is required.

DISCUSSION:

641-42.1 of the Radiation Machines and Radioactive Materials Rules defines diagnostic radiography as "the science and art of applying x-radiation to human beings for diagnostic purposes other than in dental radiography. It shall include adjustment or manipulation of x-ray equipment and appurtenances including image receptors, positioning of patients, and processing of films so as to materially affect the radiation exposure of patients."

Therefore, a permitted radiographer may position the patient and expose and manually process the film. This discussion involves the use of auxiliary personnel by radiographers or physicians to assist in the production of the radiograph. Any auxiliary personnel are prohibited from performing the above activities unless these activities are performed under the direct verbal instruction of the radiographer or physician who is physically present in the room. Example: The physician asks the nurse to change a dial on the control panel from x to y; this is acceptable. The physician asks the nurse to "set it for a larger patient"; this is not acceptable because it requires a determination on the part of the nurse that she has not been trained to make.

During fluoroscopy cases such as cath lab procedures, the physician may ask auxiliary personnel to adjust the patient or c-arm or dial because the physician is scrubbed and sterile or actively engaged in another aspect of the procedure. As long as the directions are very specific and the auxiliary personnel makes no independent decisions (as if the auxiliary person was an extension of the physician's arms), this is acceptable. The auxiliary personnel may not independently take the cine films, but may replay films or digital images for the physician since this does not involve independent decision making. See examples above.

This also applies to limited radiographers who may be asked to perform or help perform examinations outside their limited scope of practice. The general radiographer or physician must be in the room, giving specific instructions, and using the limited radiographer as an extension of their own arms. The limited radiographer should make no independent decisions involving the use of the x-ray equipment during these examinations. Therefore, physicians and general radiographers should not request limited radiographers to perform radiography for which the limited radiographer is not specifically trained and permitted to perform.

Auxiliary personnel may insert film into or remove films from an automatic processor except in mammography. Trained and/or experienced darkroom techs may process mammography films if they have been instructed by a qualified person in this procedure. Only a permitted radiographer or registered service provider should perform quality control testing on the processor or manual processing system. Use of the automatic processor does not involve additional exposure to the patient but quality control may.

The student exemption (641-42.3(4)) allows the student to perform diagnostic radiography procedures, but only under the direct supervision of a licensed practitioner or permitted radiographer. Since the student does not have a permit to practice, this means the physician or radiographer must be physically present in the room with the student during the procedure. The only exception to this is in general radiography schools where the student has completed all the competencies in a certain area.

For any violations of the Radiation Machines and Radioactive Materials Rules, the individual performing the procedure and the facility are both in noncompliance and can be fined up to \$1000 a day per violation. Plus the IDPH may revoke the individual's permit to practice. The nursing board may also withdraw a nursing license, and in certain cases, Medicare funding may be jeopardized. Violations also open up the individual and the facility to civil liability issues.

Please note that the Rule and this information notice are in no way meant to restrict or interfere with the duties and/or responsibilities of a licensed physician or diagnostic radiographer in regard to performing diagnostic radiography.

If you have any questions regarding the above, please contact Charlene Craig 515/281-4942 or Paul Koehn 515/281-3806.

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Date